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FOR COURT USE ONLY

☐ Individual appearing without attorney
☐ Attorney for:

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - DIVISION

In re:
Wendy Chen

CASE NO.: **1:13-bk-17403**

CHAPTER **7**

DEBTOR'S MOTION TO CONVERT CASE
UNDER 11 U.S.C. §§ 706(a) OR 1112(a)

Debtor.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE: Hon. Victoria Kausman

1. Debtor hereby moves this Court for an Order converting the above chapter 7 case to a case under chapter 13 on the grounds set forth below:

2. **Filing Information:**

- a. ☒ A Voluntary Petition under chapter ☒ 7 ☐ 11 ☐ 12 ☐ 13 was filed on: 11/25/2013
- b. ☐ An Involuntary Petition under chapter ☐ 7 ☐ 11 was filed on: _____
☐ An Order of Relief under chapter ☐ 7 ☐ 11 was entered on: _____
- c. ☐ An Order of Conversion to chapter ☐ 7 ☐ 11 ☐ 12 ☐ 13 was entered on: _____
- d. ☐ Other (specify): _____

3. **Procedural Status:**

- a. Name of trustee appointed (*if any*): Diane C. Weil
- b. Name of Attorney of Record for trustee (*if any*): _____

4. Debtor alleges that this case has not been previously converted.

5. Debtor alleges that the motion is filed in good faith, and that Debtor is eligible for relief under the chapter for which conversion is requested.

WHEREFORE, Debtor prays that this court issue an Order (the form of which is submitted herewith and has been served) converting this case from one under chapter 7 to a case under chapter ____.

Date: February 3, 2014

Respectfully submitted,
StoneCroft Attorneys, APC

Printed name of law firm

/s/ Michael Akhidenor

Signature

Printed name of Debtor/Trustee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

7034 Van Nuys Blvd., Suite C
Van Nuys, CA 91405

A true and correct copy of the foregoing document entitled (*specify*): DEBTOR'S MOTION TO CONVERT CASE UNDER 11 U.S.C. §§ 706(a) OR 1112(a) will be served or was served (**(a)**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**(b)**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 2/3/2014, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On 2/3/2014, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

February 3, 2014

Michael O Akhidenor Esq. 258148

/s/ Michael Akhidenor

Date

Printed Name

Signature

Diane Weil (TR) dcw@dcweillaw.com, dweil@ecf.epiqsystems.com
Michael O Akhidenor on behalf of Debtor Wendy Chen akhidenor@att.net
United States Trustee (SV) ustpregion16.wh.ecf@usdoj.gov

Chase Auto
Attn:National Bankruptcy Dept
Po Box 29505
Phoenix, AZ 85038

Citibank Usa
Citicorp Credit Services/Attn:Centralize
Po Box 20507
Kansas City, MO 64195

Citimortgage Inc
Po Box 9438,dept 0251
Gaithersburg, MD 20898

First Data
1307 Walt Whitman Rd
Melville, NY 11747

Wells Fargo Card Ser
1 Home Campus
3rd Floor
Des Moines, IA 50328